

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433
(JRT/DJF)

**DECLARATION OF
CARY JOSHI**

I, Cary Joshi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with Bailey & Glasser LLP. I am over the age of 18 and make this declaration upon my personal knowledge.
2. Lindell Management LLC has not paid the judgment entered by the Court on February 22, 2024 (ECF 46).
3. On February 22, 2024, Mr. Zeidman served post-judgment discovery requests on Lindell. (Interrogatories and Requests for Production attached as Exhibits A and B).
4. No responses or objections have been provided to date.
5. Beginning on March 28, 2024, I wrote to counsel for Lindell Management LLC, Thomas F. Miller, requesting responses to discovery.
6. I spoke with Mr. Miller on the phone on March 29, 2024, at which time I resent to Mr. Miller the interrogatories and requests for production in Word format to facilitate him responding to the requests.

7. I continued to communicate with Mr. Miller by email regarding the responses to discovery.

8. Mr. Miller has produced some documents but has not provided written responses to the interrogatories and requests for production despite repeated requests.

9. On April 5, 2024, I informed Mr. Miller that I would request a hearing for a motion to compel responses if I did not receive written responses by April 8, 2024.

10. To date, I have not received any written responses to my February 22, 2024 interrogatories and requests for production.

11. Mr. Miller has not communicated to me any reason or justification for failing to respond.

12. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

DATED: April 26, 2024

BAILEY & GLASSER LLP

/s/ Cary Joshi

Cary Joshi

Attorney for Petitioner Robert Zeidman